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VIA ECFS

October 7, 2019

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, S.W. Washington, DC 20554

Attn: Wireline Competition Bureau

Re: Notice of Consolidation of Commonly-Owned Study Areas-AMENDED Interstate Telecommunications Cooperative, Inc. South Dakota Study Areas 391654 and 391679 CC Docket No. 96-45

On behalf of Interstate Telecommunications Cooperative, Inc. ("Interstate"), JSI respectfully submits the attached notice of consolidation in CC Docket No. 96-45. The attached amends the notice filed October 3, 2019 in the above-referenced docket to correctly state that both study areas receive Alternative Connect America Cost Model II support, and provides the Wireline Competition Bureau notice of the consolidation effective January 1, 2020, of the Interstate South Dakota study areas.

Please direct inquiries regarding this filing to the undersigned consultant for the Company.

Sincerely,

John Kuykendall Vice President

L Kkudell

on behalf of

Bryan Roth, CEO Interstate Telecommunications Cooperative, Inc.

Attachment

October 7, 2019

Ryan Palmer, Chief Telecommunications Access Policy Division Wireline Competition Bureau Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: Notice of Consolidation of Commonly-Owned Study Areas Interstate Telecommunications Cooperative, Inc. South Dakota Study Areas 391654 and 391679 CC Docket No. 96-45

Dear Mr. Palmer,

Interstate Telecommunications Cooperative, Inc. ("Interstate" or "Cooperative") is an incumbent local exchange carrier which owns two study areas in the state of South Dakota – Study Area Codes 391654 and 391679. Both study areas operate under the same Cooperative entity, and are authorized to receive Alternative Connect America Cost Model II support.

Interstate hereby notifies the Federal Communications Commission ("FCC" or "Commission") that effective January 1, 2020, the Company will consolidate the foregoing study areas with 391654 being the surviving study area. Pursuant to FCC precedent, no prior approval is required when commonly-owned existing study areas in the same state are consolidated.¹

Bryan Roth, CEO

cc: Alexander Minard, FCC

Suzanne Yelen, FCC

Victor Gaither, High Cost Program, Universal Service Administrative Co.

Jeff Phillips, National Exchange Carrier Association

¹ See, e.g., Request for Clarification Filed by the National Exchange Carrier Association. Inc., and Petitions for Waivers Filed by Alaska Telephone Company, Ducor Telephone Company, and Kingsgate Telephone, Inc., Concerning the Definition of "Study Area" in the Part 36 Appendix-Glossary of the Commission's Rules, AAD 95-173, AAD 96-29, AAD 96-51, Memorandum Opinion and Order. 11 FCC Red 8156, 8160 (Com. Carr. Bur. July 16, 1996).